

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

<p>In re:</p> <p>FAIRFIELD SENTRY LIMITED, et al.,</p> <p>Debtor in Foreign Proceedings.</p>	<p>Chapter 15 Case</p> <p>Case No. 10-13164 (JPM)</p> <p>Jointly Administered</p>
<p>FAIRFIELD SENTRY LTD. (IN LIQUIDATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>THEODOOR GGC AMSTERDAM, et al.,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-03496 (JPM)</p> <p>Administratively Consolidated</p>
<p>FAIRFIELD SENTRY LTD. (IN LIQUIDATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ABN AMRO SCHWEIZ AG et al.,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-03636 (CGM)</p>
<p>FAIRFIELD SENTRY LTD. (IN LIQUIDATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ABN AMRO SCHWEIZ AG, et al.,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-03636 (CGM)</p>

**DECLARATION OF ERIN E. VALENTINE IN SUPPORT OF SIX SIS LTD.'S REPLY
IN SUPPORT OF MOTION TO DISMISS**

I, ERIN E. VALENTINE, hereby declare under penalty of perjury as follows:

1) I am a member of the bar of this Court and Counsel at Chaffetz Lindsey LLP, attorneys for Defendant SIX SIS Ltd. ("Defendant"). I respectfully submit this Declaration in support of SIX SIS Ltd.'s Reply in Support of Motion to Dismiss.

2) Attached hereto as Exhibit A is a true and correct copy of the opinion by the UK Privy Council in *Fairfield Sentry Ltd. v. Migani*, [2014] UKPC 9, available at <https://www.jcpc.uk/cases/docs/jcpc-2012-0061-judgment.pdf> (last visited August 16, 2023).

3) Attached hereto as Exhibit B is a true and correct copy of the Declaration of Stephan Hänseler in Support of Defendant's Motion to Dismiss the Amended Complaint, filed by Defendant SIX SIS AG in *Picard v. SIX SIS AG*, Adv. Pro. No. 12-01195 (CGM) (ECF No. 124).

4) Attached hereto as Exhibit C is a true and correct copy of the Swiss Financial Markets Infrastructure Act ("FMIA"), available at <https://www.fedlex.admin.ch/eli/cc/2015/853/en> (last visited August 16, 2023), translated thereof.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 16, 2023
New York, New York

/s/ Erin E. Valentine
Erin E. Valentine